

# WILLKIE FARR & GALLAGHER<sub>LLP</sub>

ALAN J. LIPKIN  
212 728 8240  
alipkin@willkie.com

787 Seventh Avenue  
New York, NY 10019-6099  
Tel: 212 728 8000  
Fax: 212 728 8111

November 1, 2013

VIA ECF

Honorable Carla E. Craig  
Chief United States Bankruptcy Judge  
United States Bankruptcy Court  
271 Cadman Plaza East  
Brooklyn, New York 11201

Re: Interfaith Medical Center, Inc. ("IMC")  
Chapter 11 Case No. 12-48226-(CEC)

As To: November 4, 2013 Hearing at 10:30 a.m.

Dear Judge Craig:

This letter responds to the letter, dated November 1, 2013, from Avrum Rosen, counsel to NYSNA, requesting an adjournment of the November 4, 2013 hearings scheduled in the Interfaith case because NYSNA has not had an "adequate opportunity" to analyze IMC's updated Closure Plan and complete preparation for the November 4 hearing. The letter recites that 1199, the Public Advocate, and IM Foundation, Inc. join in the request.

Preliminarily, Mr. Rosen's letter inaccurately states NYSNA's adjournment request was e-mailed "this morning". In fact, Mr. Rosen's e-mail was sent at 2:12 p.m. without any prior call. Thus, by the time IMC or I even was aware of the request, the November 4, 2013 Court Agenda had been filed. Also, the letter misstates that the Closure Plan "was filed with the Department of Health five days ago", when in fact the submission was more recent.

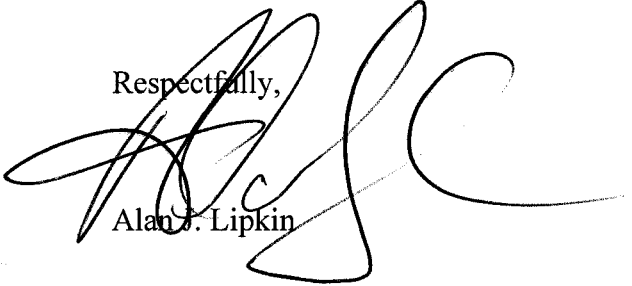
Additionally Mr. Rosen's letter is disingenuous at best regarding the purported need for more time to evaluate the updated Closure Plan. The updated Closure Plan was submitted to the Department of Health at 8:25 p.m. on October 28, 2013. Both NYSNA and 1199 received copies of the updated Closure Plan from IMC the next day, Tuesday, October 29, 2013, at approximately 1:00 p.m. Further, it is apparent that the IM Foundation has had a copy of the updated Closure Plan for some time as extensive information from the Closure Plan was incorporated into the IM Foundation's amended Disclosure Statement filed at 12:05 p.m. today. Thus, the only remaining objectors to IMC's Motion with standing had ample time to review the updated Closure Plan.

Honorable Carla E. Craig  
November 1, 2013  
Page 2

All of that being said, as a courtesy, IMC would agree to a brief adjournment if: (a) the Court has hearing time available during the week of November 11 (or shortly thereafter) equivalent to the one and a half days reserved next week on November 4 and 6; (b) IMC's uncontested motion to extend its exclusive periods is heard on November 6 (without prejudice to the IM Foundation's motion to terminate exclusivity); and (c) the IM Foundation's motion to terminate exclusivity as well as the Public Advocate's various pending motions are adjourned concurrently with IMC's Motion for authority to implement the Closure Plan. Otherwise, IMC does not agree to the adjournment request.

Consequently, IMC respectfully requests that the adjournment request be granted on the terms outlined by IMC in this letter.

Respectfully,



Alan S. Lipkin

AJL:ms

Cc: Avrum Rosen  
Suzanne Hepner  
Charles Simpson  
Marty Bunin  
David Neier  
Paul Labov  
Michael Brofman

10661194.2